

**IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE
FOR THE MIDDLE DISTRICT
NASHVILLE DIVISION**

JENAI HAYES,)	No. 3:20-cv-01023 LEAD CASE
)	
DR. LILY MORENO LEFFLER,)	Judge Trauger
)	(CONSOLIDATED)
)	
and)	
)	
DR. JAMES BAILEY,)	
DR. PIPPA MERIWETHER, and)	
DR. DAMON CATHEY,)	
)	
Plaintiffs,)	
)	
v.)	
)	
METROPOLITAN GOVERNMENT)	
OF NASHVILLE AND DAVIDSON)	
COUNTY, TENNESSEE and)	
DR. ADRIENNE BATTLE,)	
)	
Defendants.)	

DECLARATION OF RYAN LATIMER
[28 U.S.C. § 1746]

I, Ryan Latimer, hereby declare under the penalties of perjury, the following:

1. I am over the age of 18 and competent to make this declaration.
2. I served as Director of Boundary and Planning for the Metropolitan Nashville Public Schools, from January 2019 - present July 2022.
3. As Director of Boundary and Planning, my job duties included creating the annual staffing projections, developing 5- and 10-year projections for facility planning, developing and maintaining school attendance boundaries and overseeing a small department that provides technical assistance for the Office of School Choice, providing research for various departments,

maintaining the district's Geographic Information Systems (GIS) database and monitoring the homeschool program.

4. During the spring of 2020, in my role as Director, my direct supervisor was Ken Stark.

5. During the spring of 2020, Jenai Hayes served as Director of School Choice for the Metropolitan Nashville Public Schools.

6. Director of School Choice job duties were related to the district's School Choice program and included designing and implementing appropriate policies and procedures for district school options and maintaining the district's school choice platform Smart Choice.

7. During the spring of 2020, the Director of School Choice, was directly supervised by Antoinette Williams.

8. Director of School Choice and Director of Boundary and Planning during the spring of 2020 were two separate and distinct roles, with different duties and responsibilities, as well as different supervisors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 19, 2022.


Ryan Latimer

Certificate of Service

I hereby certify that a true and accurate copy of the forgoing has been served via CM/ECF to: Ann Buntin Steiner, Steiner & Steiner, LLC, 613 Woodland Street, Nashville, TN 37206, and Jesse Ford Harbison, Jesse Ford Harbison Law, PLLC, 1109 N. 6th Street, Nashville, TN 37207 on July 27, 2022

/s/ J. Brooks Fox
J. Brooks Fox